



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

201-15596

JUN 30 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dr. William E. Rinehart
President Emeritus and
Consultant in Toxicology
Industrial Health Foundation
34 Penn Circle West
Pittsburgh, PA 15206-3612

Dear Dr. Rinehart:

Thank you for your letters dated November 23, 1999, and May 12, 2000, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letters requested that the Agency remove Cyclohexanone oxime (CAS No. 100-64-1) from the HPV list on the basis that the chemical is a non-isolated intermediate in the production of caprolactam. EPA recommends that you submit an exemption request to EPA if you believe Cyclohexanone oxime (CAS No. 100-64-1) is a non-isolated intermediate as this term is defined under 40 CFR 720.3(w). Your request should include a description of the manufacturing process and the final disposition of the substance.

Cyclohexanone oxime (CAS No. 100-64-1), is on the HPV Chemical List because it was reported at HPV levels under the 1990 IUR. As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website at www.epa.gov/chemrtk in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that Cyclohexanone oxime (CAS No. 100-64-1) **does not meet** the no longer HPV criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsca-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201